



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10002

Application granted. The City of New York's deadline to file a status letter on its anticipated motion is extended to May 2, 2022.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 53.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 15, 2022

By ECF

Hon. Philip M. Halpern
United States District Judge
Southern District of New York
Hon. Charles L. Brieant, Jr. Federal Building and
300 Quarropas Street
White Plains, NY 10601

Re: Arfhy Santos v. USA, et al., 21 Civ. 8009 (PMH)

Your Honor:

I am a Senior Counsel in the New York City Law Department, attorney for defendant City of New York in the above-referenced matter. I write to respectfully request an extension of time, from April 20, 2022 to May 2, 2022, to file defendant City's status letter regarding its attempts to gather documents in support of its anticipated Rule 12 or Rule 56 motion. This is defendant City's first request for an extension to file its status letter and it is made with the consent of all counsel. The requested extension will not affect any other scheduled deadlines in this matter.

The reason for this request is that I am currently on trial in the Eastern District of New York in the matter of Wingate v. City of New York, et al., 14 CV 4063 (EK)(JRC), which involves a *pro se* plaintiff and nine defendant correction officers. Jury selection commenced April 13, 2022 and, due to factors beyond defendants' control, jury selection is not expected to resume until April 18, 2022. Once a jury has been selected, the trial is expected to continue through April 20, 2022 and possibly into the week of April 25, 2022.

I thank the Court for its consideration herein.

Respectfully submitted,

/s/ Christopher G. Arko

Christopher G. Arko
Senior Counsel

cc: Ilyssa S. Fuchs, Esq. (*Attorney for plaintiff*)
David E. Farber, Esq. (*Attorney for the United States of America*)